

POPHAM, HAIK, SCHNOBRICH, KAUFMAN & DOTY, LTD.  
4344 IDS CENTER  
MINNEAPOLIS, MINNESOTA 55402  
TELEPHONE AND TELECOPIER  
612-333-4800



WAYNE G. POPHAM  
ROGER W. SCHNOBRICH  
DENVER KAUFMAN  
DAVID S. DOTY  
ROBERT A. MINISH  
ROLFE A. WORDEN  
G. MARC WHITEHEAD  
BRUCE D. WILLIS  
FREDERICK S. RICHARDS  
G. ROBERT JOHNSON  
GARY R. MACOMBER  
ROBERT S. BURK  
HUGH V. PLUNKETT, III  
FREDERICK C. BROWN  
THOMAS K. BERG  
BRUCE D. MALKERSON  
JAMES R. STEILEN  
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ALLEN W. HINDERAKER

CLIFFORD M. GREENE  
D. WILLIAM KAUFMAN  
MICHAEL O. FREEMAN  
THOMAS C. D'AQUILA  
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LEE E. SHEEHY  
LESLIE GILLETTE  
MICHAEL T. NILAN  
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ROBERT C. MOILANEN  
STEVEN G. HEIKENS  
THOMAS F. NELSON  
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DAVID L. HASHMALL  
KATHLEEN M. MARTIN

JOHN C. CHILDS  
DOUGLAS P. SEATON  
THOMAS E. SANNER  
BRUCE B. MCPHEETERS  
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SCOTT E. RICHTER  
GREGORY L. WILMES  
ELIZABETH A. THOMPSON  
TIMOTHY W. KUCK  
KEITH J. HALLELAND  
THOMAS C. MIELENHAUSEN  
STEVEN I. LOWENTHAL  
KATHLEEN A. SLATZ  
MICHAEL D. CHRISTENSON  
J. MICHAEL SCHWARTZ  
LARAYE M. OSBORNE  
  
OF COUNSEL  
FRED L. MORRISON

2080 PETRO-LEWIS TOWER  
717 SEVENTEENTH STREET  
DENVER, COLORADO 80202  
TELEPHONE AND TELECOPIER  
303-292-2660

SUITE 802-2000 L STREET, N. W.  
WASHINGTON, D. C. 20036  
TELEPHONE AND TELECOPIER  
202-887-5154

February 25, 1985

Stephen Shakman, Esq.  
Dennis Coyne, Esq.  
Lisa Tiegel, Esq.  
Special Asst. Atty. General  
Minnesota Pollution Control  
Agency, 4th Floor  
1935 West County Road B2  
Roseville, Minnesota 55113

Edward J. Schwartzbauer, Esq.  
Dorsey & Whitney  
2200 First Bank Place East  
Minneapolis, Minnesota 55402

David Hird, Esq.  
Room 1260  
Environmental Enforcement Sec.  
Land & Natural Resources Div.  
U.S. Department of Justice  
10th & Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Francis X. Hermann, Esq.  
Assistant U.S. Attorney  
234 U.S. Courthouse  
110 South Fourth Street  
Minneapolis, Minnesota 55401

Gary Hansen, Esq.  
Russell C. Brown, Esq.  
Stoppelstad, Brown & Smith  
2000 North Central Tower  
445 Minnesota Street  
St. Paul, Minnesota 55101

Lawrence R. Waldoch, Esq.  
Lindquist & Vennum  
4200 IDS Center  
Minneapolis, Minnesota 55402

James T. Swenson, Esq.  
Mackall, Crounse & Moore  
1600 TCF Tower  
Minneapolis, Minnesota 55402

Thomas W. Wexler, Esq.  
Peterson, Engberg & Peterson  
700 Title Insurance Building  
Minneapolis, Minnesota 55401

Re: United States of America, et al. vs.  
Reilly Tar & Chemical Corporation, et al.  
Our File No. 3857-011  
Civil File No. 4-80-469

96-7-1-21  
FEB 29 1985  
LANDS DIVISION  
POLLUTION ENFORCEMENT

All Counsel of Record  
February 25, 1985  
Page 2

Dear Counsel:

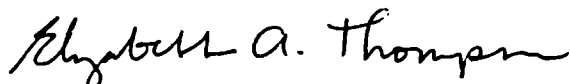
By this letter, served upon you by United States mail, the City of St. Louis Park responds to Paragraph 1 of the Stipulation which was enclosed in Edward J. Schwartzbauer's January 30, 1985 correspondence to William Sierks and which concerns the admissibility of analytical data.

Paragraph 1 of the Stipulation provided for a February 15, 1985 exchange of lists of analytical data which each party intends to introduce in the Phase I trial in this matter. By oral agreement, the parties extended the service date to February 19, 1985 for all parties, and by further oral agreement, extended the service date for the City to the present.

The City's list includes all data referenced in the State and Federal governments' list dated February 19, 1985. In addition, the City adds to the list of the State and Federal governments all analytical data and reports from Capsule Laboratories and Pace Laboratories which the City is in the process of gathering and will produce to all parties as soon as they are available.

Finally, the City reserves the the right to introduce into evidence data from any other laboratory including but not limited to Rocky Mountain Laboratories, National Biocentrics Laboratories and phenol analyses by E. A. Hickok & Associates.

Very truly yours,

  
Elizabeth A. Thompson

EAT/jmp  
2010w

cc: Robert Leininger, Esq.  
Wayne G. Popham, Esq.  
Mr. James L. Brimeyer